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September 26, 2014

Elizabeth E. Goldin  
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**VIA HAND DELIVERY**

EEO Staff  
Policy Division  
Media Bureau  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

RECEIVED - FCC  
SEP 26 2014  
Federal Communications Commission  
Bureau / Office

**Re: Response to Broadcast EEO Audit Letter  
Radio License Holding SRC LLC<sup>\*</sup>  
Station KTCK(AM), Dallas, TX, Facility ID No. 8773,  
and  
Radio License Holdings LLC  
KSCS(FM), Fort Worth, TX, Facility ID No. 71201**

EEO Staff:

On behalf of Radio License Holding SRC LLC and Radio License Holdings LLC, licensees of the above referenced broadcast stations, and the commonly owned stations in the Dallas, Texas station employment unit ("SEU"), the undersigned submits the SEU's response to your letter of June 10, 2014 concerning compliance with the Commission's Equal Employment Opportunity rules, 47 C.F.R. § 73.2080. In accordance with your request, this submission consists of a sworn statement by Richard S. Denning, Esquire, Senior Vice President, Secretary, and General Counsel of the licensee, with copies of documentation responsive to your inquiry.

Should any questions arise concerning this submission, kindly contact the undersigned.

Respectfully submitted,

  
Elizabeth E. Goldin

*Counsel to Radio License Holding SRC LLC and  
Radio License Holdings LLC*

cc: Richard S. Denning, Esq.

<sup>\*</sup> The Commission's letter identified the licensee of Station KTCK(AM), Dallas, TX as Susquehanna Radio Corp. However, the station was the subject of a recent assignment to Radio License Holding SRC LLC on June 10, 2014. See Main File Number BALH-20140227AEV.

## DECLARATION OF RICHARD S. DENNING

I, Richard S. Denning, hereby declare as follows:

I am Senior Vice President, Secretary, and General Counsel of Radio License Holding SRC LLC, the licensee of Station KTCK(AM), Dallas, Texas (Fac. ID # 8773) and Radio License Holdings LLC, the licensee of Station KSCS(FM), Fort Worth, Texas (Fac. ID # 71201), both of which are a part of a station employment unit based in Dallas, Texas and which includes KLIF-FM, Haltom City, Texas (Fac. ID # 27299), KLIF(AM), Dallas, Texas (Fac. ID # 35061), KPLX(FM), Fort Worth, Texas (Fac. ID # 54675), WBAP(AM), Fort Worth, Texas (Fac. ID # 71200) and KTCK-FM, Flower Mound, Texas (Fac. ID # 26468) (the "SEU" or "Unit").<sup>1</sup> The stations in this SEU are commonly owned through subsidiaries ultimately owned and controlled by Cumulus Media Inc. (collectively, "Cumulus"). This Statement and relevant attachments are being submitted in response to the June 10, 2014 letter of Lewis C. Pulley, Assistant Chief to the Policy Division of the Federal Communication Commission's Media Bureau, concerning a random audit of the SEU's EEO compliance (the "EEO Audit Letter").

1. This SEU employs five or more full-time employees as the term is defined in the broadcast EEO rule of the Federal Communication Commission ("FCC" or the "Commission"), 47 C.F.R. § 73.2080(e)(1).
2. In response to Question 3(a) of the EEO Audit Letter, a copy of the SEU's two most recent EEO public file reports, as described in 47 C.F.R. § 73.2080(c)(6), are appended at Attachment A.

The web addresses of the stations in this SEU are as follows: KTCK(AM) and KTCK-FM (*simulcast*), [www.theticket.com](http://www.theticket.com); KSCS(FM), [www.kscs.com](http://www.kscs.com); KLIF-FM, [www.i93hits.com](http://www.i93hits.com); KLIF(AM), [www.klif.com](http://www.klif.com); KPLX(FM), [www.995thewolf.com](http://www.995thewolf.com); and, WBAP(AM), [www.wbap.com](http://www.wbap.com). A copy of the current report is included on or linked to each of these websites.

The date of each full-time hire listed in the SEU's most recent EEO public file report, as required by 47 C.F.R. § 73.2080(c)(5)(vi), is included in the internal business records appended at Attachment B.

3. In response to Question 3(b) of the EEO Audit Letter, the licensee acknowledges that it is required to retain records to document its outreach to the recruitment sources used to fill its full-time positions, including those filled during the period covered by the above EEO public file reports. However, pursuant to the EEO Audit Letter, only one such notice per position is included at Attachment B.
4. In response to Question 3(c) of the EEO Audit Letter, the internal business records appended at Attachment B provide data concerning (a) the total number of interviewees for each

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<sup>1</sup> Recruitment activity is also included for the SEU's employees working on behalf of KESN(FM), Allen, Texas (Fac. ID # 58265), which is subject to a Local Programming and Marketing Agreement dated October 8, 2013, between Susquehanna Radio Corp. (Programmer) and KESN Assets, LLC (Licensee).

vacancy and (b) the referral source for each interviewee for each particular full-time vacancy filled during the period covered by the above EEO public file report.

5. In response to Question 3(d) of the EEO Audit Letter, documentation of the Unit's performance of recruitment initiatives as described in §73.2080(c)(2) is appended at Attachment C. Station personnel involved in the recruitment initiatives are noted in Attachment C as well. This SEU employs a total of 160 full-time employees and at least one of our stations is located in a market with a population of more than 250,000. Accordingly, the SEU is required to perform at least four recruitment initiatives during a two-year period.

6. In response to Question 3(e) of the EEO Audit Letter, the licensee affirms that it is not aware of any pending or resolved discrimination complaints filed against the licensee of the stations in this SEU since September 16, 2011.<sup>2</sup>

7. In response to Question 3(f) of the EEO Audit Letter, the licensee affirms that Cumulus has created and deployed an EEO compliance plan. Further, at the corporate level, Cumulus helps ensure FCC EEO compliance by communicating the importance of broad outreach and recordkeeping to employees at all levels within the company, including its national, regional and local personnel. Cumulus engages its outside communications counsel to conduct comprehensive FCC EEO training sessions, which are compulsory for all market and business managers and include the distribution of written compliance aids targeted to key personnel within each SEU involved in recruitment and hiring activity. Finally, corporate counsel regularly responds to SEU requests for assistance, and outside counsel is frequently called upon to provide assistance to SEUs in preparing their annual EEO Public File Reports and to provide FCC EEO guidance, as warranted.

At the local level, the SEU's Market Manager, Dan Bennett and Business Manager, Thomas Dailey, are responsible for implementing its EEO program. Mr. Dailey assumes primary responsibility for overseeing EEO compliance but receives the assistance of Mr. Bennett as well as the various department managers. This management practice—receiving input from a team of informed personnel—helps ensure compliance efforts are continuously observed. Mr. Dailey contacts the SEU's ample list of recruitment sources whenever there is a full-time job opening, assists department managers during the hiring process and also maintains the associated records. Over the years, this SEU has developed relationships with its recruitment source contacts and works closely with a number of area colleges, hosting student interns and speaking to groups of students about career opportunities in broadcasting. The SEU also hosts two job fairs each year entitled "Putting Texans Back to Work," securing the space, soliciting local employers and organizing all logistical aspects of these events. In addition, it promotes and hosts open houses at its studios to inform job seekers about careers opportunities in broadcasting. This SEU's compliance efforts include identifying Cumulus' efforts to afford equal employment opportunities to employees through statements disseminated in job applications and posted in conspicuous areas within the workplace.

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<sup>2</sup> As of September 16, 2011, Cumulus finalized its acquisition of control of Citadel Broadcasting Corporation and its 228 radio stations. See Existing Shareholders of Cumulus Media, Inc., et al., 29 FCC Rcd. 12956 (2011).

8. In response to Question 3(g) of the EEO Audit Letter, the licensee affirms that the SEU understands that it must periodically analyze the effectiveness of its EEO recruitment program by reviewing the productivity of sources on its recruitment list and the outcome of its recruitment initiatives. This SEU routinely examines its recruitment sources and adjusts its outreach as needed and is always open to new and different initiatives to better inform the communities it serves about career opportunities in broadcasting.

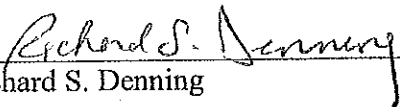
9. In response to Question 3(h) of the EEO Audit Letter, this SEU strives to comply with all federal, state and/or local laws regarding pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that the Unit provides equal opportunity and does not discriminate against employees or applicants. This SEU's employment practices are the ultimate responsibility of the Unit's Market and Business Managers, Dan Bennett and Tom Dailey respectively, working in conjunction with in-house counsel at Cumulus corporate headquarters and, when applicable, outside employment and labor counsel.

Dated: September 26, 2014

[SIGNATURE PAGE FOLLOWS]

**SIGNATURE PAGE TO  
DECLARATION OF RICHARD S. DENNING**

As of the date set forth above, I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

  
Richard S. Denning

**KLIF(AM), KTCK(AM), KPLX(FM), KLIF(FM),  
KTDK(FM), WBAP(AM), WBAP-FM and KSCS(FM)<sup>1</sup>**  
**EEO PUBLIC FILE REPORT**  
**April 1, 2012-March 31, 2013<sup>2</sup>**

**I. VACANCY LIST**

See Section II, the "Master Recruitment Source List" ("MRS�") for recruitment source data

<b>Job Title</b>	<b>Recruitment Sources ("RS") Used to Fill Vacancy</b>	<b>RS Referring Hiree</b>
Writer/Producer	4, 21, 42 *	4
Account Executive	1-5, 7, 9, 11-21, 23-24, 26-31, 33, 36, 38, 40	4
Account Executive	1-5, 7, 9, 11-21, 23-24, 26-31, 33, 36, 38	3
Account Executive	1-5, 7, 11-21, 23-24, 26-31, 33, 36, 38	4
Sales Assistant/Office Manager	1-2, 4, 6-7, 9, 11, 14-21, 23-24, 26-31, 33, 36, 38	4
Production Director	1-2, 4, 7, 9, 11-12, 14-21, 23-24, 26-31, 33, 38	21
Account Executive	1-4, 7, 9, 11, 14-21, 23-24, 26-31, 33, 38, 44	44
Account Executive	1-4, 7, 9, 11, 14-21, 23-24, 26-31, 33, 38, 44	3
Account Executive	1-4, 7, 9, 11, 14-21, 23-24, 26-31, 33, 38	2
On-Air Talent	1-2, 4, 7, 9, 11-12, 14-21, 23-24, 26-31, 33, 38	4
Producer	1-2, 4, 6-7, 9, 11-12, 14-21, 23-24, 26-31, 33, 38	21
Production	1-2, 4, 6-7, 9, 11-12, 14-21, 23-24, 26-31, 33, 38	21
Account Executive	1-4, 6-7, 9, 11-12, 14-21, 23-24, 26-31, 33, 38	4
Account Executive	1-7, 9, 11-12, 14-21, 23-24, 26-31, 33, 38	5
Producer/Board Operator	1-2, 4, 6-7, 9, 11-12, 14-21, 23-24, 26-31, 33, 38	4
Digital Media Director	1-4, 7, 9, 11-12, 14-21, 23-24, 26-31, 33, 38	3
Account Executive	1-4, 6-7, 9, 11, 14-21, 23-24, 26-31, 33, 38	3
Account Executive	1-4, 6-7, 9, 11, 14-21, 23-24, 26-31, 33, 38	2
Account Executive	1-4, 6-7, 9, 11, 14-21, 23-24, 26-31, 33, 38	4
Account Executive	1-7, 9, 11, 14-21, 23-24, 26-31, 33, 38	4
Account Executive	1-4, 6-7, 9, 11, 14-21, 23-24, 26-31, 33, 38	2
Account Executive	1-4, 6-7, 9, 11, 14-21, 23-24, 26-31, 33, 38	3
Webmaster	1-2, 4, 6-7, 9, 11-12, 14-21, 23-24, 26-31, 33, 38	6
Account Executive	1-4, 6-7, 9, 11, 14-21, 23-24, 26-31, 33, 38	3
Account Executive	1-4, 6-7, 9, 11, 14-21, 23-24, 26-31, 33, 38	4
Account Executive	1-4, 6-7, 9, 11, 14-21, 23-24, 26-31, 33, 38	4
Local Sales Manager	1-7, 9, 11-12, 14-21, 23-24, 26-31, 33-34, 38	5

*\*Exigent circumstances*

<sup>1</sup> On March 31, 2011, the assignment of license of KKLF(AM), Richardson, Texas (Fac. ID 86684) from Susquehanna Radio Corp. to Volt Radio, LLC, as Trustee, was completed (see FCC File No. BAL-20110331AKA). Pursuant to the underlying trust agreement, KKLF(AM) may share employees with this SEU.

<sup>2</sup> This Report provides recruitment data collected from March 22, 2012 through March 21, 2013 and was revised in September 2014 to address reporting issues.

**KLIF(AM), KTCK(AM), KPLX(FM), KLIF(FM),  
KTDK(FM), WBAP(AM), WBAP-FM and KSCS(FM)  
EEO PUBLIC FILE REPORT  
April 1, 2012-March 31, 2013**

**II. MASTER RECRUITMENT SOURCE LIST (“MRSL”)**

<b>RS Number</b>	<b>RS Information</b>	<b>Source Entitled to Vacancy Notification? (Yes/No)</b>	<b>No. of Interviewees Referred by RS Over Reporting Period</b>
1	<b>Cumulus Business Managers</b> <i>(Intercompany Posting)</i> BM@cumulus.com	No	0
2	<b>Station Website Postings –dfwradio.com</b>	No	22
3	<b>On-Air Announcements</b> <i>(one or more SEU stations)</i>	No	31
4	<b>Word-of-Mouth Referral</b>	No	36
5	<b>Walk-in/Self-Referral</b>	No	3
6	<b>Job Fairs/Open Houses</b> <i>(see Section III)</i>	No	5
7	<b>Internal Posting</b> <i>(Copier Room)</i>	No	18
8	<b>Crossroads Career</b> PO Box 49664 Charlotte, NC 28277 800-941-3566 Crossroadscareer.org	No	0
9	<b>Ohio Center For Broadcasting</b> 5330 East Main Street, Suite 200 Columbus, OH 43212 614-245-0555 Gary James Placement.columbus@beonair.com	No	0
10	<b>Texas Workforce Commission</b> 2922 MLK Boulevard Dallas, TX 75215 214-421-2460 Sally Nelson www.twc.state.tx.us	No	0
11	<b>Greater Asian Chamber of Commerce</b> 11171 Harry Hines Boulevard, #115 Dallas, TX 75229 972-241-8250 Kim Hoyoung (hoyoung@gdaacc.com)	No	0

RS Number	RS Information	Source Entitled to Vacancy Notification? (Yes/No)	No. of Interviewees Referred by RS Over Reporting Period
12	<b>Dallas Black Chamber of Commerce</b> 2838 MLK Boulevard Dallas, TX 75215 214-421-5200 Carmen Humble (chum@dbcc.org)	No	0
13	<b>Dallas Hispanic Chamber of Commerce</b> 4622 Maple Avenue, #207 Dallas, TX 75219 214-521-6007 Paula Rosas (prosas@gdhcc.com)	No	0
14	<b>Texas Christian University/tcu.edu</b> PO Box 297300 Ft. Worth, TX 76129 817-257-5572 Hirepurple@tcu.edu Mary Beth Grayson- m.b.grayson@tcu.edu Bethany Kilgore- b.kilgore@tcu.edu Ashley Grubbs- ashley.s.grubbs@tcu.edu Jessica Cates- j.cates@tcu.edu	No	1
15	<b>Southern Methodist University/smu.edu</b> Hegi Family Career Development Center PO Box 750256 Dallas, TX 75275-0256 214-768-2266 214-768-4292 (fax) recruit@smu.edu Guy Davis- guyd@smu.edu	No	0
16	<b>University of Dallas/udallas.edu</b> 1845 E. Northgate Drive, Carpenter Hall, Room 141 Irving, TX 75062-4736 972-721-5131 972-721-5044 (fax) Harriet H. Cousins career@udallas.edu	No	0
17	<b>DeVry University</b> 4800 Regent Boulevard Irving, TX 75063-2439 972-929-6777 Joan Long- jlong@devry.edu Saundra Lohr- slohr@devry.edu	No	0



<b>RS Number</b>	<b>RS Information</b>	<b>Source Entitled to Vacancy Notification? (Yes/No)</b>	<b>No. of Interviewees Referred by RS Over Reporting Period</b>
18	<b>Dallas County Community College District</b> jobservices@dcccd.edu Notification includes all colleges listed below: El Centro College – elcentrocollege.edu Eastfield College – eastfieldcollege.edu Northlake College - northlakecollege.edu Mountain View College – mountainviewcollege.edu Brookhaven College – brookhavencollege.edu Richland College – richlandcollege.edu Cedar Valley College – cedarvalleycollege.edu	No	0
19	<b>Capital City African American Chamber of Commerce</b> 5407 North IH 35, Suite 304 Austin, TX 78723 512-459-1181 admin@capcitychamber.org	No	0
20	<b>League United Latin American Citizens (LULAC)</b> 9090 Lake Carolyn Parkway, #1700 Irving, TX 75039 214-219-2133 Joe Campos (jcampos@lulac.org)	No	0
21	<b>All Access Website</b> www.allaccess.com	No	10
22	<b>Media Staffing Network</b> info@mediastaffingnetwork.com	No	0
23	<b>University of Texas at Dallas/utdallas.edu</b> UTD Career Center PO Box 830688, MC-16 Richardson, TX 75083-0688 972-883-29443 972-883-2431 (fax) Jody Everson, Employer Relations Coordinator recruit@utdallas.edu	No	0
24	<b>University of Texas at Arlington/uta.edu</b> PO Box 19156 Arlington, TX 76019-0156 817-272-2932 817-272-5792 (fax) Barbara Peet, Director of Career Services careers@uta.edu	No	1

RS Number	RS Information	Source Entitled to Vacancy Notification? (Yes/No)	No. of Interviewees Referred by RS Over Reporting Period
25	<b>Ft Worth Metropolitan Black Chamber of Commerce</b> 1150 South Freeway, Suite 211 Ft. Worth, TX 76105 817-871-6538 817-332-6438 (fax)	No	0
26	<b>The Art Institute of Dallas</b> Two Northpark East 8080 Park Lane, Suite 100 Dallas, TX 75231 469-587-1213 Jennifer Magee (jmagee@aai.edu)	No	0
27	<b>Texas Women's University</b> 304 Administration Drive PO Box 425589 Denton, TX 76204 940-TWU-2000 Sherri Williams careers@twu.edu	No	0
28	<b>University of North Texas</b> 1155 Union Circle #311277 Denton, TX 76203-5017 940-565-2000 Dan Naegeli- naegeli@unt.edu	No	2
29	<b>Austin College</b> 900 N. Grand Avenue Sherman, TX 75090-4400 903-813-2000 Lance Ott career@austincollege.edu	No	0
30	<b>Dallas Baptist University</b> 3000 Mountain Creek Pkwy Dallas, TX 75211 214-333-5360 Marion Hill Marion@dbu.edu	No	0

RS Number	RS Information	Source Entitled to Vacancy Notification? (Yes/No)	No. of Interviewees Referred by RS Over Reporting Period
31	<b>Tarrant County College</b> 817-515-8223 Northeast Campus (necareerservices@tccd.edu) 828 West Harwood Rd., Hurst, TX 76054-3299 Northwest Campus (nw.ccarerrservices@tccd.edu) 1500 Houston St, Ft. Worth, TX 76102 South Campus (monica.bettle@tccd.edu) 5301 Campus Drive, Ft. Worth, TX 76119 Southeast Campus (tracy.williams@tccd.edu) 2100 Southeast Pkwy, Arlington, TX 76018	No	1
32	<b>American Women In Radio &amp; Television Website</b> www.awrt.org	No	0
33	<b>Greater Dallas Indo-American Chamber of Commerce</b> 5930 LBJ Freeway, Suite 350 Dallas, TX 75240 214-346-9559 gdiacc@gdiacc.org	No	0
34	<b>Texas Association of Broadcasters (TAB)</b> 502 E. 11 <sup>th</sup> Street, Suite 200 Austin, TX 78701 512-322-9944 Craig Bean (craig@tab.org)	No	1
35	<b>Texas Wesleyan University</b> 1201 Wesleyan Street Ft. Worth, TX 76105 817-531-4403 HR@texwes.edu	No	0
36	<b>Texans Can Academy</b> 325 W. 12 <sup>th</sup> Street Dallas, TX 75208 214-944-1985 Humanresources@texanscan.org	No	0
37	<b>Association for Women in Communications</b> www.womcom.org pvalenzuela@womcom.org	No	0
38	<b>Dallas Urban League (ulgdncctx.com)</b> 4315 S. Lancaster Road Dallas, TX 75216 214-915-4600 phone 214-915-4601 fax Felicia Brooks (fbrooks@ulgdncctx.com)	No	0

RS Number	RS Information	Source Entitled to Vacancy Notification? (Yes/No)	No. of Interviewees Referred by RS Over Reporting Period
39	Sportscaster Talent Agency of America www.startalent.com jon@staatalent.com	No	0
40	Dallas/Fort Worth Help Wanted www.DFWhelpwanted.com	No	0
41	Indeed Website www.indeed.com	No	1
42	Inside Radio Website www.insideradio.com	No	0
43	American Broadcasting School 712 N Watson Rd, Suite 200 Arlington, TX 76011 817-695-2474 michelle@radioschool.com	No	0
44	Zip Recruiter Website <i>(not directly contacted by SEU)</i> www.Ziprecruiter.com <i>(Internet-based job board and secondary posting service to more than 25 additional on-line job banks, eg. diversityjobs.com, monster.com and topusajobs.com)</i>	No	2
<b>TOTAL INTERVIEWEES OVER REPORTING PERIOD</b>			<b>134</b>

**KLIF(AM), KTCK(AM), KPLX(FM), KLIF(FM),  
KTDK(FM), WBAP(AM), WBAP-FM and KSCS(FM)**

**EEO PUBLIC FILE REPORT**

April 1, 2012-March 31, 2013

**III. RECRUITMENT INITIATIVES**

	Type of Recruitment Initiative (Menu Selection)	Brief Description of Activity
1	Internship Program	During this reporting period, our SEU hosted eleven (11) student interns from: University of North Texas (6); University of Texas-Arlington (2); Texas A & M (1); University of Iowa (1); and University of Maryland (1). The interns assisted the Programming Department and “shadowed” Department managers to learn about the operations and responsibilities of each department. The students also worked closely with SEU producers and provided the support necessary to help them create a variety of radio shows.
2	Participate in activity reasonably calculated to further the goal of disseminating information about employment opportunities in broadcasting	Metroplex Area Consortium of Career Centers (“MACCC”) is a group career service professionals, representing Dallas/Fort Worth community colleges and universities, dedicated to creating relationships with employers and identifying best practices to assist their students. On April 11, 2011, our SEU hosted a regular meeting of MACCC and presented information about broadcasting careers and candidate qualifications to bolster MACCC’s ability to guide applicants to the broadcasting field. SEU participants included our Operations and Promotions Directors and General Sales Manager.

	Type of Recruitment Initiative (Menu Selection)	Brief Description of Activity
3	Host Sales Open House	On April 11, 2012, our SEU hosted a sales open house at its studios in Dallas. The General Sales Managers (4) presented information about sales positions in broadcasting, candidate qualifications and the operations of a radio station during this event. This open house was promoted on one or more SEU stations.
4	Participate in event/program sponsored by an educational institution relating to careers in broadcasting	On April 20, 2012, our SEU sponsored and hosted the 5 <sup>th</sup> annual Student Media Tour organized by the Alliance of Women in Media. A group of college students visited our studios in Dallas and received a tour of the facilities. Following the tour, our SEU's Market Manager, Operations Director, Promotions and Events Director and General Sales Managers (2) presented information about broadcasting careers, candidate qualifications and the operations of a radio station.
5	Participate in Job Fair	On June 14, 2012, our SEU participated in the DeVry University Network Connections Career Fair. Our Business Manager attended this event and provided information to interested students about career opportunities in broadcasting as well as job openings and internships within the SEU.
6	Host Sales Open House	On August 16, 2012, our SEU hosted a sales open house at its studios in Dallas. The General Sales Managers (4) presented information about sales positions in broadcasting, candidate qualifications and the operations of a radio station during this event. This open house was promoted on one or more SEU stations.

	Type of Recruitment Initiative (Menu Selection)	Brief Description of Activity
7	Host Job Fair	On September 12, 2012, this SEU hosted the "Putting Texans Back to Work" job fair at the Irving Convention Center that included 120 potential employers and was attended by approximately 6,000 job seekers. Our SEU secured the exhibit space, solicited local employers and organized all logistical aspects of the event as well as participating as an exhibitor. Our Business Manager, General Sales Managers, Program Directors and Assistant Business Manager manned the Cumulus booth and spoke to interested attendees about careers opportunities in broadcasting and job openings and internships within the SEU. This event was promoted on one or more SEU stations.
8	Participate in Job Fair	On September 18, 2012, our SEU participated in the National Association of Broadcaster's Education Foundation "Radio Show Career Fair". Our Business Manager and Assistant Business Manager attended this event and provided information to attendees about careers opportunities in broadcasting and job openings and internships within the SEU.
9	Participate in event/program sponsored by a community organization relating to careers in broadcasting	On February 21, 2013, one of our SEU's Account Executives was invited to the Tower Club in Dallas to talk with the Dallas Downtown Connections Business Networking Group about radio broadcasting, the SEU's cluster of stations and the interesting sales opportunities working with a cluster of stations presents.

	Type of Recruitment Initiative (Menu Selection)	Brief Description of Activity
10	Host Job Fair	On March 19, 2013, this SEU hosted the "Putting Texans Back to Work" job fair at the Irving Convention Center that included 110 potential employers and was attended by approximately 3,500 job seekers. Our SEU secured the exhibit space, solicited local employers and organized all logistical aspects of the event as well as participating as an exhibitor. Our Business Manager, General Sales Managers, Program Directors and Assistant Business Manager manned the Cumulus booth and spoke to interested attendees about careers opportunities in broadcasting and job openings and internships within the SEU. This event was promoted on one or more SEU stations.



**KLIF(AM), KTCK(AM), KTCK-FM, KPLX(FM), KLIF(FM),  
WBAP(AM), KSCS(FM) and employees at KESN(FM)<sup>1</sup>**  
**EEO PUBLIC FILE REPORT**  
**April 1, 2013-March 31, 2014<sup>2</sup>**

**I. VACANCY LIST**

See Section II, the "Master Recruitment Source List" ("MRSL") for recruitment source data

<b>Job Title</b>	<b>Recruitment Sources ("RS") Used to Fill Vacancy</b>	<b>RS Referring Hiree</b>
Account Executive	1-7, 9, 11-12, 14-21, 23-24, 26-31, 33, 36, 38	4
Account Executive	1-7, 9, 11-12, 14-21, 23-24, 26-31, 33, 36, 38	4
Revenue Accountant	1-7, 9, 11-12, 14-21, 23-24, 26-31, 33, 36, 38	3
Account Executive	1-7, 9, 11-12, 14-21, 23-24, 26-31, 33, 36, 38	2
Account Executive	1-7, 9, 11-12, 14-21, 23-24, 26-31, 33, 36, 38, 47	3
Account Executive	1-7, 9, 11-12, 14-21, 23-24, 26-31, 33, 36, 38, 47	34
Account Executive	1-7, 9, 11-12, 14-21, 23-24, 26-31, 33, 36, 38	2
Digital Director	1-2, 4-5, 7, 9, 11-12, 14-21, 23-24, 26-31, 33-34, 36, 38, 40, 42, 44-45, 48	42
Account Executive	1-7, 9, 11-21, 23-24, 26-31, 33-34, 36, 38, 40, 44-45	4
Account Executive	1-7, 9, 11-21, 23-24, 26-31, 33-34, 36, 38, 40, 44-45	4
Production/Imaging	1, 4-7, 9, 11-19, 21, 23-24, 26-31, 33-34, 36, 38, 40, 44-45	21
On-Air Host	1, 4-7, 9, 11-19, 21, 23-24, 26-31, 33-34, 36, 38, 40, 44-45	4
Account Executive	1-7, 9, 11-19, 21, 23-24, 26-31, 33-34, 36, 38, 40, 44-45, 47	47
Account Executive	1-5, 7, 9, 11-19, 21, 23-24, 26-31, 33-34, 36, 38, 40, 44-45	4
Account Executive	1-7, 9, 11-19, 21, 23-24, 26-31, 33-34, 36, 38, 40, 44-45	3
Account Executive	1-5, 7, 9, 11-19, 21, 23-24, 26-31, 33-34, 36-38, 40, 42, 44-45, 47-48	4
Promotions Director	1-5, 7, 9, 11-19, 21, 23-24, 26-31, 33-34, 36, 38, 40, 42, 44-45, 47	42
Talk Show Host	4-5, 21, 42*	4

*\*Exigent circumstances*

<sup>1</sup> Station KESN is subject to a Local Programming and Marketing Agreement dated October 8, 2013, between Susquehanna Radio Corp. (Programmer) and KESN Assets, LLC (Licensee).

<sup>2</sup> This Report was revised in September 2014 to address reporting issues.

**KLIF(AM), KTCK(AM), KTCK(FM), KPLX(FM), KLIF(FM),  
WBAP(AM), KSCS(FM) and employees at KESN(FM)  
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**II. MASTER RECRUITMENT SOURCE LIST ("MRSL")**

<b>RS Number</b>	<b>RS Information</b>	<b>Source Entitled to Vacancy Notification? (Yes/No)</b>	<b>No. of Interviewees Referred by RS Over Reporting Period</b>
1	<b>Cumulus Business Managers</b> BM@cumulus.com	No	0
2	<b>Station Website Postings</b> <i>(one or more SEU stations)</i>	No	12
3	<b>On-Air Announcements</b> <i>(one or more SEU stations)</i>	No	16
4	<b>Word-of-Mouth Referral</b>	No	34
5	<b>Walk-in/Self-Referral</b>	No	6
6	<b>Job Fair(s)/Open House(s)</b> <i>(see Section III)</i>	No	5
7	<b>Internal Posting</b>	No	2
8	<b>Crossroads Career</b> PO Box 49664 Charlotte, NC 28277 800-941-3566 Crossroadscareer.org	No	0
9	<b>Ohio Center For Broadcasting</b> 5330 East Main Street, Suite 200 Columbus, OH 43212 614-245-0555 Gary James Placement.columbus@beonair.com	No	0
10	<b>Texas Workforce Commission</b> 2922 MLK Boulevard Dallas, TX 75215 214-421-2460 Sally Nelson www.twc.state.tx.us	No	0
11	<b>Greater Asian Chamber of Commerce</b> 11171 Harry Hines Boulevard, #115 Dallas, TX 75229 972-241-8250 Kim Hoyoung (hoyoung@gdaacc.com)	No	0

RS Number	RS Information	Source Entitled to Vacancy Notification? (Yes/No)	No. of Interviewees Referred by RS Over Reporting Period
12	<b>Dallas Black Chamber of Commerce</b> 2838 MLK Boulevard Dallas, TX 75215 214-421-5200 Carmen Humble (chum@dbcc.org)	No	0
13	<b>Dallas Hispanic Chamber of Commerce</b> 4622 Maple Avenue, #207 Dallas, TX 75219 214-521-6007 Paula Rosas (prosas@gdhcc.com)	No	0
14	<b>Texas Christian University/tcu.edu</b> PO Box 297300 Ft. Worth, TX 76129 817-257-5572 Mary Beth Grayson- m.b.grayson@tcu.edu Bethany Kilgore- b.kilgore@tcu.edu Ashley Grubbs- ashley.s.grubbs@tcu.edu Jessica Cates- j.cates@tcu.edu	No	0
15	<b>Southern Methodist University/smu.edu</b> Hegi Family Career Development Center PO Box 750256 Dallas, TX 75275-0256 214-768-2266 214-768-4292 (fax) recruit@smu.edu Alicia Love - atlove@smu.edu	No	0
16	<b>University of Dallas/udallas.edu</b> 1845 E. Northgate Drive, Carpenter Hall, Room 141 Irving, TX 75062-4736 972-721-5131 972-721-5044 (fax) Harriet H. Cousins career@udallas.edu	No	0
17	<b>DeVry University</b> 4800 Regent Boulevard Irving, TX 75063-2439 972-929-6777 Joan Long- jlong@devry.edu Saundra Lohr- slohr@devry.edu	No	1

RS Number	RS Information	Source Entitled to Vacancy Notification? (Yes/No)	No. of Interviewees Referred by RS Over Reporting Period
18	<b>Dallas County Community College District</b> Notification includes all colleges listed below: DCCCD Dept Email – bhcjobs@dcccd.edu El Centro College – elcentrocollege.edu Eastfield College – eastfieldcollege.edu Northlake College – northlakecollege.edu Mountain View College – mountainviewcollege.edu Brookhaven College – brookhavencollege.edu Richland College – richlandcollege.edu Cedar Valley College – cedarvalleycollege.edu Adam Clawson – adamc@dcccd.edu Crystal Larthridge – clarthridge@edu Francienne Amynard – fmaynard@dcccd.edu Juanita Hancock-Dickey – jhancock-dickey@dcccd.edu Mike Alford – malford@dcccd.edu Mike Henderson – mhenderson@dcccd.edu Patsy Caropresi – pcaropresi@dcccd.edu Warren Osby – wosby@dcccd.edu	No	0
19	<b>Greater Austin Chamber of Commerce</b> 5407 North IH 35, Suite 304 Austin, TX 78723 512-459-1181 www.austinbcc.org admin@austinbcc.org	No	0
20	<b>League United Latin American Citizens (LULAC)</b> 9090 Lake Carolyn Parkway, #1700 Irving, TX 75039 214-219-2133 Joe Campos (jcampos@lulac.org) Closed – 8/28/13	No	0
21	<b>All Access Website</b> www.allaccess.com	No	3
22	<b>Media Staffing Network</b> info@mediastaffingnetwork.com	No	0
23	<b>University of Texas at Dallas/utdallas.edu</b> UTD Career Center PO Box 830688, MC-16 Richardson, TX 75083-0688 972-883-29443 972-883-2431 (fax) Nakoya Moss recruit@utdallas.edu	No	0

<b>RS Number</b>	<b>RS Information</b>	<b>Source Entitled to Vacancy Notification? (Yes/No)</b>	<b>No. of Interviewees Referred by RS Over Reporting Period</b>
24	<b>University of Texas at Arlington/uta.edu</b> PO Box 19156 Arlington, TX 76019-0156 817-272-2932 817-272-5792 (fax) Barbara Peet, Director of Career Services careers@uta.edu Nicole Caron -- caron@uta.edu Nikki Dickens -- nikki@uta.edu	No	0
25	<b>Ft Worth Metropolitan Black Chamber of Commerce</b> 1150 South Freeway, Suite 211 Ft. Worth, TX 76105 817-871-6538 817-332-6438 (fax)	No	0
26	<b>The Art Institute of Dallas</b> Two Northpark East 8080 Park Lane, Suite 100 Dallas, TX 75231 469-587-1213 Nicole Rincon -- nrincon@aai.edu	No	0
27	<b>Texas Women's University</b> 304 Administration Drive PO Box 425589 Denton, TX 76204 940-TWU-2000 Sherri Williams - careers@twu.edu	No	0
28	<b>University of North Texas</b> 1155 Union Circle #311277 Denton, TX 76203-5017 940-565-2000 Dan Naegeli- naegeli@unt.edu	No	0
29	<b>Austin College</b> 900 N. Grand Avenue Sherman, TX 75090-4400 903-813-2000 Lance Ott - career@austincollege.edu	No	0
30	<b>Dallas Baptist University</b> 3000 Mountain Creek Pkwy Dallas, TX 75211 214-333-5360 Marion Hill - Marion@dbu.edu	No	0

<b>RS Number</b>	<b>RS Information</b>	<b>Source Entitled to Vacancy Notification? (Yes/No)</b>	<b>No. of Interviewees Referred by RS Over Reporting Period</b>
31	<b>Tarrant County College</b> 817-515-8223 Northeast Campus (necareerservices@tccd.edu) 828 West Harwood Rd., Hurst, TX 76054-3299 Northwest Campus (nw.ccareerservices@tccd.edu) 1500 Houston St, Ft. Worth, TX 76102 South Campus (monica.bettle@tccd.edu) 5301 Campus Drive, Ft. Worth, TX 76119 Southeast Campus (secareerservices@tccd.edu) Tracy Williams tracy.williams@tccd.edu Gina Maloy - gina.maloy@tccd.edu 2100 Southeast Pkwy, Arlington, TX 76018	No	0
32	<b>American Women In Radio &amp; Television Website</b> www.awrt.org	No	0
33	<b>Greater Dallas Indo-American Chamber of Commerce</b> 5930 LBJ Freeway, Suite 350 Dallas, TX 75240 214-346-9559 gdiacc@gdiacc.org	No	0
34	<b>Texas Association of Broadcasters (TAB)</b> 502 E. 11 <sup>th</sup> Street, Suite 200 Austin, TX 78701 512-322-9944 Craig Bean (craig@tab.org)	No	4
35	<b>Texas Wesleyan University</b> 1201 Wesleyan Street Ft. Worth, TX 76105 817-531-4403 HR@texwes.edu	No	0
36	<b>Northwood University</b> 1114 W FM 1382 Cedar Hill, TX 75104-1204 Celeste Lindell - Lindell@northwood.edu	No	0
37	<b>Association for Women in Communications</b> www.womcom.org pvalenzuela@womcom.org	No	0
38	<b>Dallas Urban League (ulgdnetx.com)</b> 4315 S. Lancaster Road Dallas, TX 75216 214-915-4600 phone 214-915-4601 fax Tonya Berry -- tberry@ulgdnetx.com Katrina King -- kking@ulgdnetx.com	No	0

<b>RS Number</b>	<b>RS Information</b>	<b>Source Entitled to Vacancy Notification? (Yes/No)</b>	<b>No. of Interviewees Referred by RS Over Reporting Period</b>
39	<b>Sportscaster Talent Agency of America</b> www.startalent.com jon@staatalent.com	No	0
40	<b>American Broadcasting School</b> 712 N Watson Rd, Ste. 200 Arlington, TX 76011 817-695-2474 michelle@radioschool.com	No	0
41	<b>Dallas/Fort Worth Help Wanted</b> www.DFWhelpwanted.com	No	0
42	<b>Indeed Website</b> www.indeed.com	No	7
43	<b>Inside Radio Website</b> www.insideradio.com	No	0
44	<b>The Campus Special, LLC</b> 3575 Koger Blvd, Suite 150 Duluth, GA 30096 770-807-7474 770-206-2289 (fax) www.Campusspecial.com Allyson@campusspecial.com	No	0
45	<b>Everest College</b> 300 Six Flags Dr., Suite 100 Arlington, TX 76011 817-652-7790 ext. 192 817-649-6033 (fax) www.everest.edu Kristin Suitors- ksuitors@cci.edu	No	0
46	<b>Workforce Solutions- Greater Dallas</b> 2707 N. Stemmons Frwy, Suite 150 Dallas, TX 75207 214-920-3663 www.workintexas.com	No	0
47	<b>Linked In Website</b> www.linkedin.com	No	3
48	<b>Facebook</b> Cumulus Station Pages	No	3
49	<b>Traffic Directors Guild of America</b> www.TDGA.org	No	0
<b>TOTAL INTERVIEWEES OVER REPORTING PERIOD</b>			<b>96</b>

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**III. RECRUITMENT INITIATIVES**

	Type of Recruitment Initiative (Menu Selection)	Brief Description of Activity
1	Internship Program	During this reporting period, our SEU hosted fourteen (14) student interns from: University of North Texas (10); Oklahoma State University (1), Texas Wesleyan (1), El Centro College (1), & University of Texas-Dallas (1). The interns assisted the Programming/Promotion Departments and “shadowed” Department managers to learn about the operations and responsibilities of each department. The student interns also worked closely with SEU producers and provided the support necessary to help them create a variety of radio shows.
2	Participate in event/program sponsored by a community organization relating to careers in broadcasting	On April 5, 2013, our Promotions and Events Director was invited to the University of North Texas to speak at the Event Management Class meeting. She talked with students about how an event is run from start to finish, the different types of events from promotional appearances to live road shows, and how to create/develop a unique brand.
3	Participate in event/program sponsored by a community organization relating to careers in broadcasting	On May 20, 2013, two of our SEU’s Sales Mangers spoke at the Media Sales Institute Career Day sponsored by the National Association of Broadcasters. This event took place on the University of North Texas campus during which our Managers talked with the students about effective sales presentations and the basics of being a great sales executive.



	Type of Recruitment Initiative (Menu Selection)	Brief Description of Activity
4	Host Job Fair	On September 25, 2013, our SEU hosted the "Putting Texans Back to Work" job fair at the Arlington Convention Center that included 100 potential employers and was attended by approximately 4,500 job seekers. Our SEU secured the exhibit space, solicited local employers and organized all logistical aspects of the event as well as participating as an exhibitor. Our Business Manager, General Sales Managers, Program Directors and Assistant Business Manager manned the Cumulus booth and spoke to interested attendees about careers opportunities in broadcasting and job openings and internships within the SEU. This event was promoted on one or more SEU stations.
5	Participate in event/program sponsored by a community organization relating to careers in broadcasting	On October 24, 2013, one of our SEU's On-Air Personalities addressed students at an American Broadcasting School meeting on the Arlington campus, providing information about the industry, his personal experiences as an On-Air Personality and career opportunities and internships in radio.
6	Participate in Job Fair	On January 7, 2014, our SEU participated in the Tech Career Development Conference sponsored by Communities Foundations of Texas. One of our Sales Managers attended this event and provided information to attendees about career opportunities in broadcasting and sales opportunities within the SEU.
7	Host Sales Open House	On January 30, 2014, our SEU hosted a sales open house at our studios in Dallas. The General Sales Managers (5) presented information about sales positions in broadcasting, candidate qualifications and the operations of a radio station during this event. This open house was promoted on one or more SEU stations.

	Type of Recruitment Initiative (Menu Selection)	Brief Description of Activity
8	Participate in Job Fair	On February 27, 2014, our SEU participated in the 8th Annual Sports Industry Career Fair hosted by the Dallas Stars at the American Airlines Center in Dallas. Our Business and Assistant Business Managers attended this event and provided information to interested attendees about career opportunities in broadcasting and job openings within the SEU.
9	Host Job Fair	On March 26, 2014, this SEU hosted the "Putting Texans Back to Work" job fair at the Plano Convention Center that included 90 potential employers and was attended by approximately 3,500 job seekers. Our SEU secured the exhibit space, solicited local employers and organized all logistical aspects of the event as well as participating as an exhibitor. Our Business Manager, General Sales Managers, Program Directors and Assistant Business Manager manned the Cumulus booth and spoke to interested attendees about careers opportunities in broadcasting and job openings and internships within the SEU. This event was promoted on one or more SEU stations.